



June 29, 2006

Nebraska Public Service Commission  
300 The Atrium, 1200 N Street  
Lincoln, NE 68508

RE: Application No. 911-017/PI-116

Dear Commissioners:

Thank you for the opportunity to comment on the "Staff Proposed Interim Implementation Policy" regarding interim policies for the administration of the Enhanced Wireless 911 Fund pending implementation of LB 1222.

Cricket currently provides Phase I E911 service to PSAPs in Cass, Douglas, Dodge, Lancaster, and Sarpy counties. Cricket has not received any requests for Phase II but stands ready to begin deployment if requested.

Cricket sends invoices on a monthly basis to the Commission for reimbursement. The invoice is broken down by county and includes line items for recurring charges to our third party vendor, TCS, as well as small amounts for facilities charges and engineering and operations charges. The vendor charges are directly correlated to the number of cell sites in each county that are linked to the E911 system. In the 21 states in which Cricket operates, most states reimburse us like Nebraska does, on a per-cell site basis.

Cricket urges the Commission during the interim period not to make any changes in how it currently reimburses for Phase I costs. Should the commission not be able to provide additional funding for Phase II costs, we would urge that the Phase I funding continue.

Although Cricket currently imposes a 45-cent "regulatory recovery fee" to recover costs for implementing the FCC's local number portability mandate, Cricket has chosen not to recover E911 costs from our customers (as some wireless carriers do). This is because 49% of Cricket's customers in Nebraska report less than \$35,000 in annual household income. Cricket continually strives to keep rates down for our customers as evidenced by our simple and affordable rates plans. For \$30 a month customers can get unlimited local calling and for \$45 a month customers can get unlimited local and domestic long distance calling, in addition to unlimited text and picture messaging and other calling features.

Cricket urges the Commission to continue reimbursing Phase I costs as we would prefer not to pass the cost onto our consumers, half of whom are low-income.

Sincerely,

A handwritten signature in black ink, appearing to read "Laurie Itkin". The signature is fluid and cursive, with a long, sweeping horizontal line extending to the right.

Laurie Itkin  
Director, Government Affairs

cc: Angela Melton, PSC